

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

IAN HUMPHREY,

Plaintiff,

v.

COURT FILE NO. 16-cv-370-jdp

EQUIFAX INFORMATION SERVICES LLC,
TRANS UNION, LLC, EXPERIAN INFORMATION
SOLUTIONS, INC., and NAVIENT SOLUTIONS, INC.,

Defendants.

NAVIENT SOLUTIONS, LLC'S PROPOSED ADDITIONAL VOIR DIRE QUESTIONS

Navient Solutions, LLC, formerly known as Navient Solutions, Inc. ("NSL" or "Defendant") submits the following proposed additional voir dire questions pursuant to the Court's Preliminary Pretrial Conference Order dated March 25, 2019 [Doc. No. 171]:

In this case, the plaintiff claims that the defendant failed to perform a reasonable investigation of a dispute he submitted to a consumer reporting agency.

- a. Has any one of you ever had a similar experience? Describe.
- b. Do you have close friends or relatives who have had or claimed to have had a similar experience?
- c. Have you ever sued a consumer reporting agency or a creditor or a loan servicer?
- d. Have you ever submitted a complaint against a consumer reporting agency, a creditor, or a loan servicer to the Better Business Bureau or any regulatory authority, such as a state attorney general or government agency?
- e. Do you have any close friends or relatives who have sued a consumer reporting agency or a creditor or a loan servicer?
- f. Have you ever disputed information found on a consumer report?

- g. Have you ever been behind on payments on a student loan or had a student loan in default?
- h. Do you have any feelings or opinions, whether positive or negative, about issuers or servicers of student loans, or the United States Department of Education?
- i. Have you or any close friends or relatives attended a for-profit post-secondary educational institution?

Respectfully submitted,

Dated: July 3, 2019

MOSS & BARNETT

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